UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11193-NG

SHAWN DRUMGOLD,
Plaintiff

v.

TIMOTHY CALLAHAN, FRANCIS M.
ROACHE, PAUL MURPHY, RICHARD
WALSH, and THE CITY OF BOSTON,

<u>Defendants</u>

JOHN DALEY'S NOTICE OF FILING OF DOCUMENTS FOR IN CAMERA REVIEW PURSUANT TO THIS COURT'S ORDER

Now comes retired Boston Police Lt. Det. John Daley ("Lt. Daley") in the above-referenced action and hereby files notice of filing of the following documents for in camera review, as ordered by this Court on January 22, 2007:1

A. <u>Portions of Lt. Daley's Diary Pertaining to His Tenure as Commander of the Homicide Unit and the Tiffany Moore homicide:</u>

1. Unredacted copy of Lt. Daley's diary written in approximately 1992 is attached hereto as Exhibit A;²

¹ This Court ordered in camera production after Lt. Daley's deposition. Lt. Daley's deposition concluded on February 21, 2007.

² Copies of the referenced Exhibits are not filed through the ECF system, as they are filed in camera.

2. Redacted copy of Lt. Daley's diary written in approximately 1992 is attached hereto as Exhibit B;

3. Unredacted copy of Lt. Daley's diary re-written in approximately 1995 is attached hereto as Exhibit C;

4. Redacted copy of Lt. Daley's diary re-written in approximately 1995 is attached hereto as Exhibit D;

5. Privilege/redaction log provided to counsel with production of redacted copies is attached hereto as Exhibit E.

B. <u>Copy of Lt. Daley's Diary Pertaining to the Rest of His Career</u>

Undersigned counsel is in the process of receiving and reviewing a copy of the remaining portion of Lt. Daley's diary pertaining to the rest of his career (from 1951 – 1992). After review, Lt. Daley may file a motion to amend this Court's order with regard to same.

Respectfully submitted, **JOHN DALEY**

By his attorney,

/s/ Eve A. Piemonte Stacey

Eve A. Piemonte Stacey – BBO# 628883

ROACH & CARPENTER, P.C.

24 School Street

Boston, Massachusetts 02108

Dated: March 1, 2007 (617) 720-1800

CERTIFICATE OF SERVICE

I, Eve Piemonte Stacey, hereby certify that this document was filed through the ECF system on March 1, 2007, and that a true paper copy of this document will be sent to those indicated as non registered participants on the Notice of Electronic Filing on March 1, 2007 by first class mail.

> /s/ Eve A. Piemonte Stacey Eve A. Piemonte Stacey